

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	Crim. No. 15-cr-10271-WGY
)	
ALEX LEVIN)	
_____)	

DEFENDANT'S UNOBJECTED-TO MOTION FOR
AMENDMENT OF CONDITIONS OF RELEASE

The defendant, Alex Levin, moves pursuant to 18 U.S.C. § 3145(a)(2) that this Court amend the conditions of release ordered by this Court on May 12, 2016 (Dkt. 85). Specifically, the defendant moves that his curfew be modified to allow him to leave the house at 3:00 AM rather than 6:00 AM, Sunday through Thursday, from November 5 to December 31, 2017, so that he may take on a temporary managerial role at his job during the peak season. Pretrial Services, through Probation Officer Chrissy Murphy, assents to this motion. The United States, through Assistant United States Attorney Anne Paruti, takes no position on this motion. As grounds therefore, the defendant states the following:

The defendant began working at a fulfillment center in August, 2016. The defendant's supervisors have been impressed with his work and offered the defendant a full-time position as a Senior Workflow Process Manager, which he accepted. The

defendant was recently offered an opportunity to serve a temporary managerial role during the peak season from November 5 through December 31, 2017. This temporary position will provide the defendant with much needed extra income. The defendant moves that his curfew be modified to permit him to leave his residence at 3:00 AM, Sunday through Thursday, so that he can arrive at work by 3:30 AM during this time period. The defendant's curfew would return to its normal hours after December 31, 2017.

The defendant has abided by his conditions of release at all times since being released in April of 2016. The defendant's other conditions of release: report to Pretrial Services; remain in Massachusetts; maintain residence and do not move without prior Pretrial Services approval; refrain from excessive use of alcohol; refrain from drug use; submit to random alcohol and drug testing; submit to location monitoring with a GPS ankle bracelet; curfew; and no unsupervised contact with children under 18 except his daughter, would remain in place.

WHEREFORE, the defendant moves that this Court modify his curfew so that he may leave his house at 3:00 AM, Sunday through Thursday, from November 5 through December 31, 2017.

ALEX LEVIN
By His Attorneys,

CARNEY & ASSOCIATES

J. W. Carney, Jr.

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November 1, 2017

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

J. W. Carney, Jr.

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AFFIDAVIT SUPPORTING
DEFENDANT'S MOTION FOR AMENDMENT OF CONDITIONS OF RELEASE

I, J. W. Carney, Jr., state that the facts contained in the attached motion are true to the best of my information and belief.

Signed under the penalties of perjury.

J. W. Carney, Jr.
J. W. Carney, Jr.

November 1, 2017